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Attorneys for Defendant
Takeuchi Mfg. Co. (U.S.), Ltd.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOHN BROWN,)	Case No. 2:21-cv-00392-JAM-DMC
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	ESTABLISH DEFENDANT TAKEUCHI
vs.)	MFG. CO. (U.S.), LTD'S DEADLINE TO
)	RESPOND TO THE COMPLAINT
TAKEUCHI MFG. CO. (U.S.), LTD, et al.)	
)	
Defendant(s).)	Action Filed: March 3, 2021
)	
)	

WHEREAS, on March 12, 2021, Plaintiff caused a copy of the Summons and Complaint in the above-entitled action to be served on Defendant Takeuchi Mfg. Co. (U.S.), Ltd. (hereinafter "Takeuchi U.S.");

WHEREAS, a process server has attested she served on Takeuchi Mfg. Co. (U.S.), Ltd.'s agent for service of process a Summons indicating a response was due in 21 days;

WHEREAS, the Summons delivered to Takeuchi Mfg. Co. (U.S.), Ltd. indicated the response was due in 90 days, even though Takeuchi U.S. was served in California;

WHEREAS, the Summons delivered to Takeuchi Mfg. Co. (U.S.), Ltd.'s as prepared by plaintiff was "TO: Takeuchi Mfg. Co.", and at some point "(U.S.), Ltd, a Foreign Entity" was written onto the Summons (See Exhibit A).

WHEREAS, the Plaintiff and Takeuchi Mfg. Co. (U.S.), Ltd. want to agree on a response date, avoid unnecessary arguments about service on Takeuchi Mfg. Co. (U.S.), Ltd. and provide an adequate time for Takeuchi Mfg. Co. (U.S.), Ltd. to respond to the Complaint;

1. Takeuchi Mfg. Co. (U.S.), Ltd. Takeuchi U.S.'s deadline to respond to the Complaint is May 17, 2021;
2. Takeuchi Mfg. Co. (U.S.), Ltd. will not move to dismiss for improper service, but is not waiving any other defenses.

Dated: March 29, 2021

BOWMAN AND BROOKE LLP

/S/ Neil M. Kliebenstein

Neil M. Kliebenstein

Erin Chance

Attorneys for Defendant

Takeuchi Mfg. Co. (U.S.), Ltd.

Dated: March 29, 2021

ACQUEST LAW, INC.

/S/ Nareshwar Singh Viridi

Nareshwar Singh Virdi

Attorneys for Plaintiff

John Brown

IT IS SO ORDERED.

Dated: March 29, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE